

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

ELIAS R. CAMACHO, Jr.,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant.

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CIVIL ACTION NO. EP-12-CV-40-RFC

PLAINTIFF'S WITNESS LIST

Plaintiff, **Elias R. Camacho, Jr.**, pursuant to the Court's Trial Order and Local Rule CV-16(e)(5), submits the following list of potential witnesses:

Respectfully submitted,

DOMINGUEZ & COYLE, P.L.L.C.
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By: /s/ Lynn Coyle

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Texas Bar No. 24050049
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-AND-

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2014 I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Lynn Coyle
LYNN COYLE

WITNESSES EXPECTED TO TESTIFY

1. **Elias R. Camacho, Jr.** Plaintiff may be contacted through his undersigned counsel of record. Plaintiff, Mr. Camacho will testify about the factual bases of his claims, including, but not limited to, (1) his own educational, employment, and family background, (2) the circumstances leading up to his arrest by Defendant in 2010, (3) events occurring after the arrest, (4) Defendant's investigation leading up to and following the arrest, and (5) the damages suffered by him as a result of Defendant's practices.
2. **Elias A. Camacho, Sr..** Mr. Camacho may be contacted at 10332 Shannon Pl, El Paso, Texas 79925, Tel. No. (915) 307-4839. He is Elias R. Camacho, Jr.'s father and will testify about the factual bases of Mr. Camacho, Jr.'s claims, including, but not limited to, (1) his own educational, employment, business, and family background and that of his son, (2) the circumstances leading up to his arrest by Defendant in 2010, (3) events occurring after the arrest, (4) Defendant's investigation leading up to and following the arrest, and (5) the damages suffered by his son as a result of Defendant's practices.
3. **Marco A. Camacho.** Mr. Camacho may be contacted at 3303 Kilarney Street, El Paso, Texas 79925, Tel. No. (915) 478-1115. Mr. Camacho is Elias R. Camacho, Jr.'s brother and will testify about the factual bases of Mr. Camacho, Jr.'s claims, including, but not limited to, (1) his own educational, employment, and family background and that of his brother, (2) the circumstances leading up to his arrest by Defendant in 2010, (3) events occurring after the arrest, (4) Defendant's investigation leading up to and following the arrest, and (5) the damages suffered by his brother as a result of Defendant's practices.
4. **Veronica Camacho.** Ms. Camacho may be contacted at 3416 Firestone, El Paso, Texas 79925, Tel. No. (915) 408-1907. Ms. Camacho is Elias R. Camacho, Jr.'s spouse and will testify about the factual bases of Mr. Camacho's claims, including, but not limited to, (1) her own educational, employment, and family background and that of her husband, (2) the circumstances leading up to his arrest by Defendant in 2010, (3) events occurring after the arrest, (4) Defendant's investigation leading up to and following the arrest, and (5) the damages suffered by her husband as a result of Defendant's practices.
5. **Gloria Camacho.** Ms. Camacho may be contacted at 10332 Shannon Pl, El Paso, Texas 79925, Tel. No. (915) 694-6315. She is Elias R. Camacho, Jr.'s mother and will testify about the factual bases of Mr. Camacho's claims, including, but not limited to, (1) her own educational, employment, and family background and that of her son, (2) the circumstances leading up to his arrest by Defendant in 2010, (3) events occurring after the arrest, (4) Defendant's investigation leading up to and following the arrest, and (5) the damages suffered by her son as a result of Defendant's practices.
5. **Armida "Amy" Ramirez.** See below.

6. **Octavio Amaro.** See below.
7. **Enrique Chavira.** See below.
8. **Alex Bustamante.** See below.

Messrs. Amaro, Chavira, Bustamante and Ms. Ramirez may be contacted at their place of business, Therm-O-Link, 1295 Henry Brennan Drive, El Paso, Texas 79936, Tel. No. (915) 860-9933. These witnesses will testify about the factual bases of Mr. Camacho's lawsuit including, but not limited to, (1) their business and/or personal relationship with Mr. Camacho, (2) background regarding Therm-O-Link in El Paso, (3) Mr. Camacho's whereabouts on January 12, 2010, (4) the circumstances leading up to Mr. Camacho's arrest by Defendant in 2010, (5) events occurring after the arrest, and (6) Defendant's investigation leading up to and following the arrest.

6. **Special Agent Sharron Cannella.** Ms. Cannella may be contacted through Defendant's counsel, **D. Shane Read**, Assistant United States Attorney, 1100 Commerce Street, Third Floor, Dallas, Texas 75242-1699, Tel: 214.659.8688. Ms. Canella will testify about one or more of the following: (1) Defendant's investigation of a bank robbery in January of 2010; (2) her personal and professional background; (3) the circumstances leading up to Mr. Camacho's arrest by Defendant in 2010; (4) events occurring after the arrest; and (5) the policies and practice of the United States Federal Bureau of Investigation.
7. **Supervisory Special Agent Hector Camarillo.** Mr. Camarillo may be contacted through Defendant's counsel, **D. Shane Read**, Assistant United States Attorney, 1100 Commerce Street, Third Floor, Dallas, Texas 75242-1699, Tel: 214.659.8688. Mr. Camarillo will testify about one or more of the following: (1) Defendant's investigation of a bank robbery in January of 2010; (2) his personal and professional background and that of other agents involved in Mr. Camacho's arrest; (3) the circumstances leading up to Mr. Camacho's arrest by Defendant in 2010; (4) events occurring after the arrest; and (5) the policies and practice of the United States Federal Bureau of Investigation.
4. **Defendant's Custodian of Records.** Defendant's Custodian of Records will testify about Defendant's investigative records. The Custodian of Records may be contacted through Defendant's counsel, **D. Shane Read**, Assistant United States Attorney, 1100 Commerce Street, Third Floor, Dallas, Texas 75242-1699, Tel: 214.659.8688.
5. **Arturo Ruiz.** Mr. Ruiz is a retired detective for the El Paso Police Department and the FBI Violent Crimes Task Force. He may be contacted at 12261 El Greco Cir., El Paso, Texas 79936. He will testify about one or more of the following: (1) the investigation by Defendant and El Paso Police Department of a bank robbery in January of 2010; (2) his involvement and review of the investigation of this bank robbery and Mr. Camacho's subsequent arrest; (3) his personal and professional background; (3) the circumstances leading up to Mr. Camacho's arrest by Defendant in 2010; (4) events occurring after the

arrest; and (5) the policies and practice of Defendant and the United States Federal Bureau of Investigation, the El Paso Police Department, and the FBI Violent Crimes Task Force.

WITNESSES WHICH MIGHT TESTIFY

6. **Melissa Ramos.** See below.
7. **Vivian Garcia.** See below.
8. **Blanca Chavez.** See below.

Mss. Ramos, Garcia, and Chavez may be contacted at their place of business, First Federal Bank, 7015 South Mesa Street, El Paso, Texas, 79912. They will testify as to the factual bases underlying Mr. Camacho's lawsuit, including, but not limited to, a bank robbery at their place of business in January of 2010 and the investigation of said bank robbery.

9. **Jay Tolbert.** Mr. Tolbert may be contacted at his place of business, Capital Bank, 8700 Montana, El Paso, Texas, Tel. No. (915) 779-8700. He will testify as to the factual bases underlying Mr. Camacho's lawsuit, including, but not limited to, a bank robbery at First Federal Bank, in January of 2010 and the investigation of said bank robbery.
10. **Gustavo Espinoza.** Mr. Espinoza may be contacted in Ciudad Juarez. He will testify as to the factual bases underlying Mr. Camacho's lawsuit, including, but not limited to, a business relationship, if any, with CoPart and Plaintiff and any negotiable instruments that he has received from CoPart, Mr. Camacho, or any of their agents.
11. **Martha Valles.** Ms. Valles may be contacted at 2000 Saul Kleinfeld, Apartment 910, El Paso, Texas 79936, Tel. No. (915) 252-9133. Ms. Valles may testify as to the factual bases underlying Mr. Camacho's case, including, but not limited to, the investigation of a bank robbery in January of 2010.
12. **FBI Special Agent Kent Switzer.** See below.
13. **FBI Special Agent Wesley Tidwell.** See below.
14. **FBI Special Agent Kyle Casey.** See below.
15. **FBI Special Agent K.C. Hughes.** See below.
16. **FBI Special Agent Lorenzo Perez.** See below.
17. **FBI Special Agent Robert Gillespie.** See below.

18. **FBI Special Agent Lonnie Camacho.** See below.
19. **FBI Special Agent Michael A. Cordero.** See below.

Special Agents Switzer, Tidwell, Casey, Hughes, Perez, Gillespie, Camacho, and Cordero will testify about one or more of the following: (1) Defendant's investigation of a bank robbery in January of 2010; (2) their personal and professional background; (3) the circumstances leading up to Mr. Camacho's arrest by Defendant in 2010; (4) events occurring after the arrest; and (5) the policies and practice of the United States Federal Bureau of Investigation. All listed above may be contacted through Defendant's counsel, **D. Shane Read**, Assistant United States Attorney, 1100 Commerce Street, Third Floor, Dallas, Texas 75242-1699, Tel: 214.659.8688.

20. **Assistant United States Attorney Brandy Gardes.** See below.
21. **Assistant United States Attorney William Lewis.** See below.

Ms. Gardes and Mr. Lewis will testify about one or more of the following: (1) Defendant's investigation of a bank robbery in January of 2010; (2) their involvement and review of the investigation of this bank robbery and Mr. Camacho's subsequent arrest; (3) their personal and professional background; (3) the circumstances leading up to Mr. Camacho's arrest by Defendant in 2010; (4) events occurring after the arrest; and (5) the policies and practice of Defendant and the United States Federal Bureau of Investigation.

Plaintiff reserves the right to designate and call rebuttal witnesses to testify.